

Exhibit 10

From: [Kaiser, Steven J.](#)
To: [Ronnie Spiegel](#)
Cc: [mmulqueen@bakerdonelson.com](#); [nberkowitz@bakerdonelson.com](#); [pcoggins@lockelord.com](#); [bgaffney@lockelord.com](#); [Joseph Saveri](#); [Elissa A. Buchanan](#)
Subject: Re: Stipulation re depositions
Date: Thursday, March 24, 2022 1:52:09 PM
Attachments: [~WRD0003.jpg](#)
[~WRD0003.jpg](#)

Our position is we do not agree to your motion.

I know you weren't involved in the discussions, the departed Ms Malone was, but as she was told and I assume you know, Bain and Charlesbank's position has always been that any depositions beyond the three were inappropriate. That is why we reserved the right to say no to particular depositions, as we now have. Please do not misrepresent that to the Court.

We will of course oppose your motion in due course.

—

Steven J. Kaiser

Cleary Gottlieb Steen & Hamilton LLP

[2112 Pennsylvania Avenue, NW](#)

[Washington, DC 20037](#)

T: [+1 202 974 1554](#)

[skaiser@cgsh.com](#) | [clearygottlieb.com](#)

On Mar 24, 2022, at 4:46 PM, Ronnie Spiegel <rspiegel@saverilawfirm.com> wrote:

Steve,

Thank you for letting us know your position so that we may inform the Court.

Ronnie

From: Kaiser, Steven J. <skaiser@cgsh.com>
Sent: Thursday, March 24, 2022 1:43 PM
To: Ronnie Spiegel <rspiegel@saverilawfirm.com>
Cc: [mmulqueen@bakerdonelson.com](#); [nberkowitz@bakerdonelson.com](#); [pcoggins@lockelord.com](#); [bgaffney@lockelord.com](#); [Joseph Saveri](#) <jsaveri@saverilawfirm.com>; [Elissa A. Buchanan](#) <EABuchanan@saverilawfirm.com>
Subject: Re: Stipulation re depositions

Ronnie there is no agreement. You rejected our proposal. We've discussed this several times with you. You may not just take the parts you like and try to get more.

—
Steven J. Kaiser

Cleary Gottlieb Steen & Hamilton LLP

[2112 Pennsylvania Avenue, NW](#)

[Washington, DC 20037](#)

T: [+1 202 974 1554](#)

skaiser@cgsh.com | clearygottlieb.com

On Mar 24, 2022, at 1:49 PM, Ronnie Spiegel
<rspiegel@saverilawfirm.com> wrote:

Counsel,

Please note, Jones Plaintiffs are planning to file a motion shortly to enter the proposed deposition protocol in the Jones Action, and to ask the court to order a sufficient number of depositions for Bain and Charlesbank depositions. We believe we are at impasse with our last compromise proposal to you being 14 total depositions, including a Rule 30(b)(6) deposition for each (to allocate as we choose across both defendants), and with Mr. Webb being allocated within the Fusion 55. My understanding is that Defendants will not agree to the 14 proposed, and last offered 10 total (4+1, each). It also seems now that Defendants are taking the position that only three fact witnesses will be produced, total, with one Rule 30(b)(6) deposition for each. Please let us know by EOB today if you would like to reconsider and agree to our compromise offer of 14. If not, please kindly let us know that as well. We are available to discuss this further today, if you feel it would be productive.

Thanks,
Ronnie

***Ronnie S. Spiegel, Partner**



601 California Street, Suite 1000
San Francisco, CA 94108
T +1 415 500 6800
F +1 415 395 9940

*Located in Washington State
400 N.W. Gilman Blvd
P.O. Box. 906
Issaquah, WA 98027

Disclaimer

The information contained in this communication from the sender is confidential. It is intended solely for use by the recipient and others authorized to receive it. If you are not the recipient, you are hereby notified that any disclosure, copying, distribution or taking action in relation of the contents of this information is strictly prohibited and may be unlawful.

This email has been scanned for viruses and malware, and may have been automatically archived by **Mimecast Ltd**, an innovator in Software as a Service (SaaS) for business. Providing a **safer** and **more useful** place for your human generated data. Specializing in; Security, archiving and compliance. To find out more [Click Here](#).

This message is being sent from a law firm and may contain confidential or privileged information. If you are not the intended recipient, please advise the sender immediately by reply e-mail and delete this message and any attachments without retaining a copy.

Throughout this communication, "Cleary Gottlieb" and the "firm" refer to Cleary Gottlieb Steen & Hamilton LLP and its affiliated entities in certain jurisdictions, and the term "offices" includes offices of those affiliated entities. Our external privacy statement is available at:
<https://www.clearygottlieb.com/footer/privacy-statement>

This message is being sent from a law firm and may contain confidential or privileged information. If you are not the intended recipient, please advise the sender immediately by reply e-mail and delete this message and any attachments without retaining a copy.

Throughout this communication, "Cleary Gottlieb" and the "firm" refer to Cleary Gottlieb Steen & Hamilton LLP and its affiliated entities in certain jurisdictions, and the term "offices" includes offices of those affiliated entities. Our external privacy statement is available at:
<https://www.clearygottlieb.com/footer/privacy-statement>